



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/RMP
F. #2021R00600

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 20, 2024

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By Email and ECF

Re: United States v. Sun, et. al.
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were obtained by the government during the course of the investigation:

Bates No.	Description of Item
EDNY_016481-EDNY_017281	Records from the New York State Executive Chamber

Bates No.	Description of Item
EDNY_017282-EDNY_017379	Records from the U.S. Department of State - SENSITIVE

The government plans to make a follow-up production on November 21, 2024 of supplemental bank records and digital evidence, to include Cellebrite Responsive Reports of devices and accounts seized during the course of the investigation.

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Alexander A. Solomon
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cc: Clerk of the Court (BMC) (by ECF) (without download link)